



DH, MMRegulations

From: Dr. Charles Harris <aimmed420@gmail.com>
Sent: Wednesday, March 31, 2021 10:33 AM
To: DH, MMRegulations
Subject: [External] Comments on proposed MMJ regulations
Attachments: mmjLegisFinalLetter.doc

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Please find attached my comments and suggestions in regards to the proposed MMJ regulations.

Any reply would be appreciated.

Thank you,
Charles Harris MD

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John J. Collins
Director
Office of Medical Marijuana
Department of Health
Room 628
Health and Welfare Building
625 Forster Street
Harrisburg, PA 17120

Dear Mr. Collins,

I have received and read through the Proposed Rulemaking by the Department of Health in regards to the Medical Marijuana regulations. Herein are a few of my suggestions for the proposed regulations:

1) 1181.27(b)(1)&(2): Please add "Emergency Medicine" to the list of specialists who can certify pediatric patients or add some sort of "Grandfather" clause. After over 3 years there are still no pediatricians in Lehigh, Carbon or Northampton counties who are certifying pediatric patients. After practicing fulltime Emergency Medicine for over 30 years I have seen well over 20,000 pediatric patients with a broad range of illnesses and injuries. I believe this qualifies me to evaluate and certify children for the State MMJ program. I have developed an expertise and specialty interest in treating patients for Autism using medical marijuana. I stay very current on the research in this area and have given presentations locally, nationally and even internationally (Okay, just Australia) on this topic. The parents of my autistic patients tell me that it is very difficult to find a certifying physician for their child. As a result I have seen over 100 pediatric patients with autism and have seen some amazing results. I am aware of the concerns about the possibilities of addiction, side effects, long term effects and withdrawal. I educate my patients and parents about these concerns. I doubt that there are more than a handful of physicians in Pennsylvania with my level of expertise and knowledge in this area. It would be a big step backwards for so many of my Autistic patients and their families if I was suddenly unable to recertify them for the MMJ program and it would make it just that much harder for new patients to get the help they need. I feel very strongly about this and would hate to lose the ability to help these most vulnerable patients. I would be more than happy to discuss this issue with you further and in more detail.

2) 1181.27(d)(1)&(3) state that the providers must give the patient a copy of their MMJ certification and keep a copy of the patient's certificate on hand and must. This is unwieldy and unnecessary. The certificates are readily available on the PA MMJ website, even past certificates. The patient, my office and the State can access these certificates at any time. My patient files are burgeoning with unused and unnecessary certificates. Whenever I ask the patient if they would like me to send them a copy of their certification the answer is almost universally "no". I think this unnecessary part of the legislation should be dropped.

3) 1181a.31(c) advertising: Over the past 3 years I have witnessed some miraculous results with the medical marijuana, results that I would like to shout from the highest hilltop. But the restrictions against advertising make me very hesitant to reach out. It is even difficult to educate my fellow physicians about the benefits of adding medical marijuana to their patients' treatment plans. Perhaps a lessening of this restriction or some guidance on what is and is not permissible would be a big help. I certainly would not want to see billboards but perhaps some guidance about promoting and marketing would help.

When I look at the programs that other states' programs I realize what a great program we have here in Pennsylvania. Kudos to those who put this program together and thank you for your consideration of these suggestions.

Please do not hesitate to contact me for further discussion.

Sincerely,

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